

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

MARCI MARIE WEBBER,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 1:20-cv-07807
)	
STATE OF ILLINOIS, et al.,)	The Hon. Charles R. Norgle, Sr.
)	
Defendants.)	

**HAROLD HIRSHMAN'S MOTION TO BE EXECUTED
FROM PRO BONO APPOINTMENT**

1. With quite a heavy heart I file this motion to be relieved of the appointment in this matter. I make this motion having interviewed the plaintiff on January 21, 2021 and her lawyer in a related matter pending in the Illinois Appellate court on January 22, 2021.

2. The Court has no way of knowing my involvement in pro bono matters but by my estimate is that for the last ten years I have spent about a 800 hours a year on pro bono matters.

3. At present I am chief counsel in Rasho v. Walker 7- cv-1298 pending in the Central District and chief trial counsel in Lippert v. Jeffreys 10-cv-4603 pending in this district. Both of these cases began as challenges to the quality of mental and physical healthcare provided by the Illinois Department of Corrections. Both cases have settled but because of Covid and issues of compliance these cases have required significant time commitments in the past few months and I contemplate the need for significant court proceedings in both cases in the next few months. In Rasho there is a pending contempt motion and the need to litigate the extension of the settlement agreement which expires by its terms in April.

4. In addition I am presently set for trial on April 1, in Montgomery Alabama in McCullough v. City of Montgomery in what began as a class action and is now a trial of seven

plaintiffs' individual claims. I fervently hope because of Covid the trial will not take place until August.

5. In the Northern District I am appointed counsel in Santiago v. Rabideau, 15-cv-1856 a case which was set for trial in November but the courthouse closed. I believe it will one of the first cases set for trial when this courthouse reopens. I am also counsel in Gevas v. Obaisi 16-cv-10599 in this district and Ralston v. Baldwin, 16-cv-1190 in the Central District.

6. My pro bono work has been a source of great personal and professional satisfaction for me and I have never turned down an appointment before. In one case I was appointed but then withdrew after appointment when I had irreconcilable differences with a client.

7. Based on my analysis this case will require a great deal of time consuming discovery which will have to be initiated promptly. I simply cannot devote the time and effort this matter requires.

Dated: January 22, 2021

Respectfully submitted,

By: /s/ Harold C. Hirshman

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 22nd day of January, 2021, I filed the foregoing with the Clerk of the Court using the CM/ECF system. Pursuant to Fed. R. Civ. P. 5(b)(3) and the Northern District of Illinois' LR 5.9, I have thereby electronically served all Filing Users.

/s/ Harold C. Hirshman